

## **REMARKS**

In the non-final Office Action dated April 21, 2008, it is noted that claims 1 – 20 are pending in the application.

In the present amendment, the abstract has been amended, and claims 1 – 5, 7, 8, 10 – 12 and 15 – 17 have been amended. No new matter has been added.

### **Objection to the Abstract**

In the Office Action, the abstract is objected to because it contains the legal term “said.”

In the present amendment, Applicants have amended the Abstract to correct this informality. No new matter has been added. Applicants respectfully request that the objection to the abstract be withdrawn.

### **35 U.S.C. §103**

Claims 1 – 6 and 10 – 20 stand rejected under 35 U.S.C. §103(a) over Sundar et al. (US 20030134650 A1), hereafter “Sundar,” in view of Chiueh et al. (US 20050053034 A1), hereafter “Chiueh.”

Applicants submit that for at least the following reasons, claims 1 – 6 and 10 – 20 are patentable over Sundar and Chiueh, either singly or in combination.

For example, claim 1 requires:

*“establishing a mapping relationship between the WWAN address and the WLAN address of the mobile terminal.”*

In the Office Action, page 3, it is conceded by the Office that Sundar does not particularly refer to establishing a mapping relationship between the WWAN address and the WLAN address of the mobile terminal. Because of this deficiency in Sundar, the Office cited Chiueh. In the Office Action, it is alleged that Chiueh, paragraph 0083, lines 13 – 19, teaches the above claimed feature. Applicants respectfully disagree.

Chiueh, paragraph 0083, lines 13 – 19, apparently discloses a mapping between the home address of the mobile node and the connections. Applicants submit that a mapping relationship between the home address of the mobile node and the connections is not the same as a mapping

relationship between the WWAN address and WLAN address of the mobile terminal. This is because it is well known in the art that the connections, as in Chiueh, can be repeatedly established and torn down while the WWAN address and WLAN address remain unchanged, and furthermore that multiple connections can be maintained simultaneously for an address. Applicants submit that a connection is not an address. Thus, clearly, the mapping relationship: home address – connection, is not the same as the mapping relationship: WWAN address – WLAN address. Since these mappings provide different mapping outputs, the mapping relationship between the home address of the mobile node and the connections cannot reasonably be considered the same as the mapping relationship between the WWAN address and WLAN address of the mobile terminal. Therefore, Chiueh fails to teach or suggest the claimed feature: establishing a mapping relationship between the WWAN address and the WLAN address of the mobile terminal.

In view of the foregoing, claim 1 is patentable over Sundar and Chiueh, either singly or in combination.

Independent claims 7, 12 and 17 are also patentable because they at least contain the feature of establishing a mapping relationship between the WWAN address and the WLAN address of the mobile terminal. As pointed out above, the combination of the references fails to teach or suggest at least this feature.

Claims 2 – 6, 10, 11, 13 – 16 and 18 – 20 are patentable because they respectively depend from claims 1, 7, 12 and 17, with each dependent claim containing further distinguishing features. Withdrawal of the rejection of claims 1 – 6 and 10 – 20 under 35 U.S.C. §103(a) is respectfully requested.

### **35 U.S.C. §102**

Claims 7 – 9 stand rejected under 35 U.S.C. §102(b) over Sundar.

As pointed out above, amended claim 7 is patentable over Sundar and Chiueh, either singly or in combination, because it contains at least the feature: establishes a mapping relationship between the WWAN address and the WLAN address of the mobile terminal.

Claims 8 and 9 are patentable because they depend from claim 7, with each dependent claim containing further distinguishing features.

Withdrawal of the rejection of claims 7 – 9 under 35 U.S.C. §102(b) is respectfully requested.

**Conclusion**

In view of the foregoing, it is respectfully submitted that all the claims pending in this patent application are in condition for allowance. Reconsideration and allowance of all the claims are respectfully solicited.

In the event there are any errors with respect to the fees for this response or any other papers related to this response, the Director is hereby given permission to charge any shortages and credit any overcharges of any fees required for this submission to Deposit Account No. 14-1270.

Respectfully submitted,

/Brian S. Myers/

By: Brian S. Myers  
Registration No.: 46,947  
For: Larry Liberchuk  
Registration No.: 40,352

**Please Address All Correspondence to:**

Larry Liberchuk, Reg. No. 40,352  
US PHILIPS CORPORATION  
P.O. Box 3001  
Briarcliff Manor, NY 10510-8001